

Presentment Date and Time: August 23, 2023, at 10:00 a.m. (prevailing Eastern Time)

Objection Date and Time: August 18, 2023, at 4:00 p.m. (prevailing Eastern Time)

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., et al.,

Debtors.¹

Chapter 11

Case No. 19-23649 (SHL)

(Jointly Administered)

**NOTICE OF PRESENTMENT OF ELEVENTH AMENDED ORDER EXTENDING
TIME TO OBJECT TO DISCHARGEABILITY OF CERTAIN DEBTS**

PLEASE TAKE NOTICE that on December 23, 2019, Purdue Pharma L.P. and certain of its affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”), filed the *Motion of Debtors for Entry of an Order Extending Time to Object to Dischargeability of Certain Debts* [ECF No. 700] (the “**Motion**”).

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Purdue Products L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

PLEASE TAKE FURTHER NOTICE that on January 7, 2020, the Court entered the *Order Extending Time to Object to Dischargeability of Certain Debts* [ECF No. 720] (the “**Order**”).

PLEASE TAKE FURTHER NOTICE that on April 2, 2020, the Court entered the *First Amended Order Extending Time to Object to Dischargeability of Certain Debts* [ECF No. 1009] (the “**Amended Order**”).

PLEASE TAKE FURTHER NOTICE that on June 18, 2020, the Court entered the *Second Amended Order Extending Time to Object to Dischargeability of Certain Debts* [ECF No. 1289] (the “**Second Amended Order**”).

PLEASE TAKE FURTHER NOTICE that on July 27, 2020, the Court entered the *Third Amended Order Extending Time to Object to Dischargeability of Certain Debts* [ECF No. 1524] (the “**Third Amended Order**”).

PLEASE TAKE FURTHER NOTICE that on October 21, 2020, the Court entered the *Fourth Amended Order Extending Time to Object to Dischargeability of Certain Debts* [ECF No. 1829] (the “**Fourth Amended Order**”).

PLEASE TAKE FURTHER NOTICE that on January 20, 2021, the Court entered the *Fifth Amended Order Extending Time to Object to Dischargeability of Certain Debts* [ECF No. 2307] (the “**Fifth Amended Order**”).

PLEASE TAKE FURTHER NOTICE that on April 22, 2021, the Court entered the *Sixth Amended Order Extending Time to Object to Dischargeability of Certain Debts* [ECF No. 2694] (the “**Sixth Amended Order**”).

PLEASE TAKE FURTHER NOTICE that on October 1, 2021, the Court entered the *Seventh Amended Order Extending Time to Object to Dischargeability of Certain Debts* [ECF No. 3859] (the “**Seventh Amended Order**”).

PLEASE TAKE FURTHER NOTICE that on February 11, 2022, the Court entered the *Eighth Amended Order Extending Time to Object to Dischargeability of Certain Debts* [ECF No. 4346] (the “**Eighth Amended Order**”).

PLEASE TAKE FURTHER NOTICE that on August 12, 2022, the Court entered the *Ninth Amended Order Extending Time to Object to Dischargeability of Certain Debts* [ECF No. 5017] (the “**Ninth Amended Order**”).

PLEASE TAKE FURTHER NOTICE that on February 23, 2023, the Court entered the *Tenth Amended Order Extending Time to Object to Dischargeability of Certain Debts* [ECF No. 5464] (the “**Tenth Amended Order**”).

PLEASE TAKE FURTHER NOTICE that the Debtors will present the *Eleventh Amended Order Extending Time to Object to Dischargeability of Certain Debts* (the “**Eleventh Amended Order**”) to the Honorable Sean H. Lane, United States Bankruptcy Judge, for approval and signature on **August 23, 2023 at 10:00 a.m. (prevailing Eastern Time)**. A copy of the Eleventh Amended Order is attached hereto as **Exhibit A**.

PLEASE TAKE FURTHER NOTICE that a comparison between the Eleventh Amended Order and the Tenth Amended Order is attached hereto as **Exhibit B**.

PLEASE TAKE FURTHER NOTICE that, unless a written objection to the Eleventh Amended Order attached hereto is served and filed with proof of service with the Clerk of the Court, and a courtesy copy is delivered to the undersigned and to the chambers of the Honorable Sean H. Lane, so as to be received by **August 18, 2023 at 4:00 p.m. (prevailing Eastern Time)**,

there will not be a hearing to consider such Eleventh Amended Order, and such Eleventh Amended Order may be signed and entered by the Court.

PLEASE TAKE FURTHER NOTICE that, if a written objection is timely filed and served with respect to the Eleventh Amended Order, a hearing (the “**Hearing**”) will be held to consider such Eleventh Amended Order before the Honorable Sean H. Lane, United States Bankruptcy Judge, at the United States Bankruptcy Court, 300 Quarropas Street, White Plains, New York 10601, on a date to be announced.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing and a failure to appear may result in relief being granted upon default.

PLEASE TAKE FURTHER NOTICE that copies of the Eleventh Amended Order may be obtained free of charge by visiting the website of Kroll Restructuring Administration at <https://restructuring.ra.kroll.com/purduepharma>. You may also obtain copies of any pleadings by visiting the Bankruptcy Court’s website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

Dated: August 9, 2023
New York, New York

DAVIS POLK & WARDWELL LLP

By: /s/ Eli J. Vonnegut
Eli J. Vonnegut

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and Debtors in Possession*

Exhibit A

Eleventh Amended Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., *et al.*,
Debtors.¹**

Chapter 11

**Case No. 19-23649 (SHL)
(Jointly Administered)**

**ELEVENTH AMENDED ORDER EXTENDING TIME TO
OBJECT TO DISCHARGEABILITY OF CERTAIN DEBTS**

Upon the motion, by notice of presentment dated December 23, 2019 (the “**Motion**”)² of Purdue Pharma L.P. and its affiliates that are debtors and debtors in possession in these cases (collectively, the “**Debtors**”) for entry of an order extending the period within which a claimant may file an adversary proceeding to determine the dischargeability of claims against the Debtors under Bankruptcy Rule 4007(c), as more fully described in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157(a)-(b) and 1334(b) and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, C.J.); and consideration of the Motion and the relief requested therein being a core

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² Unless otherwise defined herein, each capitalized term shall have the meaning ascribed to such term in the Motion.

proceeding under 28 U.S.C. § 157(b); and venue being proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion and the opportunity for a hearing thereon having been provided; and, after due deliberation the Court having determined that the legal and factual bases set forth in the Motion established good and sufficient cause for the relief granted therein; and having determined such relief was in the best interests of the Debtors, their estates, creditors and all parties in interest, the Court entered an Order granting the Motion; and the Court having previously extended the Determination Deadline through and including September 1, 2023; and the Debtors, by timely notice of presentment dated August 9, 2023, having sought entry of this Eleventh Amended Order further extending the Determination Deadline (the **“Eleventh Extension Request”**); and due and proper notice of this proposed Eleventh Amended Order and the opportunity for a hearing thereon having been provided; and there being no opposition to such request; and no additional notice or a hearing being required; and, after due deliberation and upon all of the proceedings herein, the Court having determined that the legal and factual bases set forth in the Motion and the Eleventh Extension Request establish good and sufficient cause for the relief granted herein; now, therefore,

IT IS HEREBY ORDERED THAT

1. The Eleventh Extension Request is granted.
2. Pursuant to Bankruptcy Rule 4007(c), the deadline, if any, by which a creditor must file a complaint to determine the dischargeability of a debt pursuant to section 523 of the Bankruptcy Code, as referenced in section 1141(d)(6) of the Bankruptcy Code (the **“Determination Deadline”**) is extended through and including March 1, 2024, without prejudice to further extensions upon the request of the Debtors.

3. Nothing in this Eleventh Amended Order constitutes a determination regarding the nondischargeability of any debt under section 1141(d) of the Bankruptcy Code, that sections 523 or 1141(d)(6) of the Bankruptcy Code, and/or Bankruptcy Rule 4007 apply in the Chapter 11 Cases, or that the Determination Deadline applies in these Chapter 11 Cases.

4. The contents of the Motion and the notice procedures set forth in the Eleventh Extension Request are good and sufficient notice and satisfy the applicable Bankruptcy Rules and Local Rules, and no other or further notice of the Motion or the entry of this Eleventh Amended Order is required.

5. The Debtors are authorized to take all such actions as are necessary or appropriate to implement the relief granted in this Eleventh Amended Order.

6. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Eleventh Amended Order.

Dated: White Plains, New York
_____, 2023

HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE

Exhibit B

Blackline Against Tenth Amended Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

Chapter 11

Case No. 19-23649 (SHL)

(Jointly Administered)

**TENTH ELEVENTH AMENDED ORDER EXTENDING TIME TO
OBJECT TO DISCHARGEABILITY OF CERTAIN DEBTS**

Upon the motion, by notice of presentment dated December 23, 2019 (the “**Motion**”)² of Purdue Pharma L.P. and its affiliates that are debtors and debtors in possession in these cases (collectively, the “**Debtors**”) for entry of an order extending the period within which a claimant may file an adversary proceeding to determine the dischargeability of claims against the Debtors under Bankruptcy Rule 4007(c), as more fully described in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157(a)-(b) and 1334(b) and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, C.J.); and

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), ~~Avrio-Health~~ Purdue Products L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

² Unless otherwise defined herein, each capitalized term shall have the meaning ascribed to such term in the Motion.

consideration of the Motion and the relief requested therein being a core proceeding under 28 U.S.C. § 157(b); and venue being proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion and the opportunity for a hearing thereon having been provided; and, after due deliberation the Court having determined that the legal and factual bases set forth in the Motion established good and sufficient cause for the relief granted therein; and having determined such relief was in the best interests of the Debtors, their estates, creditors and all parties in interest, the Court entered an Order granting the Motion; and the Court having previously extended the Determination Deadline through and including ~~March~~September 1, 2023; and the Debtors, by timely notice of presentment dated ~~February 7~~August 9, 2023, having sought entry of this ~~Tenth~~Eleventh Amended Order further extending the Determination Deadline (the “~~Tenth~~Eleventh Extension Request”); and due and proper notice of this proposed ~~Tenth~~Eleventh Amended Order and the opportunity for a hearing thereon having been provided; and there being no opposition to such request; and no additional notice or a hearing being required; and, after due deliberation and upon all of the proceedings herein, the Court having determined that the legal and factual bases set forth in the Motion and the ~~Tenth~~Eleventh Extension Request establish good and sufficient cause for the relief granted herein; now, therefore,

IT IS HEREBY ORDERED THAT

1. The ~~Tenth~~Eleventh Extension Request is granted.
2. Pursuant to Bankruptcy Rule 4007(c), the deadline, if any, by which a creditor must file a complaint to determine the dischargeability of a debt pursuant to section 523 of the Bankruptcy Code, as referenced in section 1141(d)(6) of the Bankruptcy

Code (the “**Determination Deadline**”) is extended through and including ~~September~~March 1, ~~2023~~2024, without prejudice to further extensions upon the request of the Debtors.

3. Nothing in this ~~Tenth~~Eleventh Amended Order constitutes a determination regarding the nondischargeability of any debt under section 1141(d) of the Bankruptcy Code, that sections 523 or 1141(d)(6) of the Bankruptcy Code, and/or Bankruptcy Rule 4007 apply in the Chapter 11 Cases, or that the Determination Deadline applies in these Chapter 11 Cases.

4. The contents of the Motion and the notice procedures set forth in the ~~Tenth~~Eleventh Extension Request are good and sufficient notice and satisfy the applicable Bankruptcy Rules and Local Rules, and no other or further notice of the Motion or the entry of this ~~Tenth~~Eleventh Amended Order is required.

5. The Debtors are authorized to take all such actions as are necessary or appropriate to implement the relief granted in this ~~Tenth~~Eleventh Amended Order.

6. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this ~~Tenth~~Eleventh Amended Order.

Dated: White Plains, New York
_____, 2023

HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE